1		HONORABLE MARSHA J. PECHMAN
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9	UNITED STATES I WESTERN DISTRIC' AT SEA	Γ OF WASHINGTON
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11	CHRISTIAN BARRETTE, and KATRENA BARRETTE, Washington citizens,	No. C10-01206
12	Plaintiffs,	STIPULATION AND ORDER TO
13	v.	EXTEND DEADLINE FOR EXPERT WITNESS DISCLOSURES
14	JUBILEE FISHERIES, INC., a Washington	
15	corporation,	
16	Defendant.	
17		
18	STIPUL	ATION
19	Parties and their counsel of record in	his matter agree, jointly request and stipulate
20		
	excitace to may 31, 2011.	
17 18	STIPULATION Parties and their counsel of record in this matter agree, jointly request and stipulate that the deadline to disclose expert witnesses and their reports, presently due May 9, 2011, be extended to May 31, 2011.	

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1	Depositions of plaintiffs were just held on April 30, 2011, and previously unknown	
2	medical allegations were discovered, for which the defendant will need an expert's opinion to	
3	defend its case. In addition, depositions of defense witnesses are yet to be held due to	
4	difficulties in contacting the witnesses and coordinating all parties' schedules.	
5	Deadline for discovery completion is currently set on July 8, 2011, and trial is	
6	scheduled to begin on December 5, 2011.	
7	Finally, this extension of expert witnesses and their reports should not affect the other	
8	case schedule.	
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10	DATED this 3rd day of May, 2011.	
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12		
13	s/Richard Nielsen	
14	RICHARD A. NIELSEN, WSBA # 11916 NIELSEN SHIELDS, PLLC	
15	600 Stewart Street, Suite 1703 Seattle, Washington 98101	
16	Telephone: 206-728-1300 Facsimile: 206-728-1302	
17	Email: ran@nielsenshields.com Attorneys for Defendant	
18		
19	s/Albert Bannon (per email authorization)	
20	ALBERT BANNON, OSBA # 69009 BANNON MEDIATION LLC	
21	200 S.W. Market St., Ste. 1777 Portland, OR 97201-5727	
22	Telephone: 503.295.7977 Facsimile: 503.225.1257	
23	Email: abannon@hk-law.com Attorneys for Plaintiff	
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1	[PROPOSED] ORDER
2	Based upon the foregoing Stipulation, the deadline to disclose the expert witnesses and
3	their reports is extended from May 9, 2011 to May 31, 2011.
4	then reports is extended from May 9, 2011 to May 31, 2011.
5	DATED this _9th_ day ofMay, 2011.
6	DATED this _9th_ day ofway, 2011.
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8	Maesluf Helens
9	Marsha J. Pechman United States District Judge
10	Officed States District Judge
11	Presented By:
12	NIELSEN SHIELDS, PLLC
13	By <u>Richard A. Nielsen</u> RICHARD A. NIELSEN, WSBA #11916
14	Nielsen Shields, PLLC 600 Stewart St. Suite 1703
15	Seattle, WA 98101 Phone: 206.728.1300
16	Fax: 206.728.1302 Email: ran@nielsenshields.com
17	Attorneys for Defendant
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23	

2 **CERTIFICATE OF SERVICE** 3 I hereby certify that on May 9, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, 4 which will send notification of such filing to the following: 5 Matt Adamson, Esq. Jameson Babbitt Stites & Lombard, PLLC 6 999 Third Ave. #1900 Seattle, WA 98104 7 Albert J. Bannon 8 Bannon Mediation LLC 200 S.W. Market St., Ste. 1777 9 Portland, OR 97201-5727 10 I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct. 11 Signed at Seattle, Washington. 12 s/Sheila Baskins 13 Legal Assistant 600 Stewart Street, Suite 1703 Seattle, Washington 98101 14 Telephone: 206-728-1300 Facsimile: 206-728-1302 15 smb@nielsenshields.com 16 17 18 19 20 21 22 23